

## ANTI-BRIBERY POLICY STATEMENT

**Maylarch Environmental Limited** (The Company) values its reputation and is committed to maintaining the highest possible ethical standards in all its business activities. It recognises that its employees are committed to ethical working, but the risks of bribery are a growing concern in both corporate and public life in many countries across the world. It is Maylarch's policy to comply completely with the UK Bribery Act 2010 and with other relevant legislations.

Maylarch strives to keep its high ethical standards, with a view to upholding its position against any form of bribery, has prepared and set out a clear policy. Maylarch prohibits the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement:

- To or from any person or company, whether a public official or public body, or a private person or company, wherever situated; or
- By any individual employee, agent or other person or organisation acting on the Company's behalf; or
- In order to gain any commercial, contractual or regulatory advantage for the Company in a way which is unethical; or
- In order to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

For the avoidance of doubt, Maylarch prohibits the making of any payments to public officials for securing or accelerating routine processes and procedures.

To further clarify, this policy prohibits the making, giving or receiving of any inducement which results in a personal gain or advantage to the recipient or any person or body associated with the recipient, and which is intended to influence the recipient to take action which may not be solely in the best interests of Maylarch Environmental Ltd.

### Gifts & Hospitality:

Our policy on the acceptance or giving of gifts or hospitality is that they must be reasonable in terms of value and frequency, and not given or offered if they may improperly influence a business decision or affect independence or judgement. Invitations to social or sports events, meals, entertainment, gifts of low value or small tokens of appreciation may be occasionally received, or offered to foster goodwill or enhance business relationships. We will never offer or accept gifts of cash, or equivalent (e.g., vouchers)

All gifts & hospitality given or received with a value of £5.00 or more must be declared, and will be recorded on a Gifts Register at Head Office.

### Responsibilities:

- The prevention, detection and reporting of bribery is the responsibility of all employees throughout the Company;
- If and when any instance of bribery is identified, remedial steps will have to be taken immediately including the reporting of the incident, or suspected incident, of bribery in accordance with the company's Whistle Blowing Policy;
- Managers should ensure all their employees are aware of this Policy and of their responsibilities to act in accordance with its procedures.
- All staff have a duty to declare gifts or hospitality given or received over £5 in value, and to politely refuse gifts or hospitality which would be deemed excessive or that could be viewed as a bribe.

### Raising Concerns and Seeking Guidance:

The Company's Whistle Blowing Policy provides details of whom to contact in the event of any concerns or doubts as to whether a potential act constitutes bribery.

*Rob Fluckiger*

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Group Managing Director